

EXHIBIT I

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CISCO SYSTEMS, INC.,

Plaintiff,

vs.

ARISTA NETWORKS, INC.,

Defendant.

CASE NO. 5:14-cv-5344-BLF

**DECLARATION OF JOHN M. NEUKOM
IN SUPPORT OF CISCO SYSTEMS,
INC.'S RESPONSE RE: JOINT
DISCOVERY LETTER**

1 I, John M. Neukom, declare as follows:

2 1. I am a partner at the law firm Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn
3 Emanuel”), counsel for Plaintiff Cisco Systems, Inc. (“Cisco”) in this action. I make this
4 declaration in support of Cisco’s Response in the July 25, 2016 Joint Discovery Letter. I make
5 this declaration based on my own personal knowledge. If called as a witness, I could and would
6 testify competently to the matters set forth herein.

7 2. On July 25, 2016, with colleagues, I participated in a search for documents—of
8 those that Cisco has produced to Arista in this case—that include the “Clueless” email address in
9 the document review platform, Recommind. Specifically, in Recommind, my colleagues and I
10 performed a search for the word “clueless.” This search resulted in 3,792 document hits. I
11 personally reviewed numerous of those documents (as a “spot check”) to ensure that they were—
12 and they were—emails sent to the “Clueless” email alias within Cisco and that they had been
13 produced by Cisco in this case, and not withheld on the basis of privilege.

14
15 I declare under penalty of perjury that the foregoing is true and correct, and that this
16 declaration was executed in San Francisco, on July 25, 2016.

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19 /s/ John M. Neukom
20 John M. Neukom
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